

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2021-324-S**

**Application of Kiawah Island Utility,
Incorporated for an Adjustment of
Rates and Charges**

**SECOND INTERROGATORIES
AND REQUESTS TO PRODUCE
TO ORS and DCA**

**TO: ALEXANDER W. KNOWLES, DONNA L. RHANEY, ATTORNEYS FOR
THE OFFICE OF REGULATORY STAFF. CARRI GRUBE LYBARKER, ROGER
P. HALL, AND CONNOR J. PARKER, ATTORNEYS FOR THE DEPARTMENT
OF CONSUMER AFFAIRS**

INSTRUCTIONS

Kiawah Island Utility, Inc., requests pursuant to S.C. Code Reg. 103-833 that the Office of Regulatory Staff (“ORS”) and Department of Consumer Affairs (“DCA”) (either generically referred to as “Agency”) provide responses to the following interrogatories and requests for production to charles.terreni@terrenilaw.com and selliott@elliottlaw.us within twenty (20) days of service of these requests. If you are unable to respond to any of the requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these requests, “identify” means, when asked to identify a person, to provide the full name, business title, address, and telephone number. As used in these requests, “address” means mailing address and business address. When asked to identify or provide a document, “identify” and “provide” mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, a copy of the document may be attached with the identity of the person who has custody of it. When the word “document” is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts,

photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings. "Person" includes any individual, firm, partnership, limited liability company, association, corporation, receiver, trustee, any group or combination acting as a unit, the State, any state agency, any instrumentality, authority, political subdivision, or municipality, or other entity. Wherever in this request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUIRED:

1. Pursuant to S.C. Code Reg. 103-833 and SCRPC Rules 33 and 34, responses to interrogatories and requests for production shall be verified.
2. In addition to the signature and verification at the close of the responses, the witness(es), employee(s), contractor(s), or agent(s) responsible for the information contained in each response shall be indicated at the bottom of each response.
3. All information provided shall be provided in electronic form only unless otherwise requested. All information available in Excel spreadsheets shall be provided in Excel. All Excel spreadsheets shall be working copies with all formulas, links and calculations intact.
4. All electronic documents provided must be provided in native file format with all formulas, links and calculations intact. Responses containing .pdf documents must be searchable. Each electronic file must be clearly marked with the Response number.
5. Any inquiries or communications relating to questions concerning clarification of the information requested below should be directed to Charles L.A. Terreni, charles.terreni@terrenilaw.com, and Scott Elliott selliott@elliottlaw.us.
6. That this entire list of requests be reproduced and included in front of each set of responses.
7. If the response to any request is that the information requested is not currently available, please advise so and state when the information requested will be available and provided. This statement is not a waiver of the deadline for all other responses.
8. This request is continuing and requires ORS to supplement or amend its responses as any additional information becomes available.
9. For every page produced that contains confidential information, the page is to be marked "CONFIDENTIAL" in the header. Any specific information which ORS designates as confidential information must also be marked by notation, highlighting, or other conspicuous means.

1. INTERROGATORIES

1. List all cases in which any expert witness called by the Agency has testified.
2. Provide a list of cases during the past 10 years in which Agency witnesses have testified regarding a utility's operating margin; and for each case:
 - a) Identify the witness, and
 - b) Provide any recommended operating margin or range of operating margins.

REQUESTS TO PRODUCE

1. Produce any documents, including workpapers and spreadsheets, supporting any accounting adjustment proposed by the Agency and/or any of its witnesses.
2. Produce any exhibit the Agency will use in the hearing of this matter.

s/ Charlie Terreni

January 11, 2022

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